

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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VISANJI GALA and  
JAYA GALA,

Plaintiffs,

Civil Action No.: 2:20-cv-02265-SHM-tmp

v.

JURY DEMANDED

TESLA MOTORS TN, INC.,  
and TESLA MOTORS, INC.,

Defendants.

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**MOTION OF TESLA MOTORS TN, INC. AND TESLA, INC.  
TO COMPEL ARBITRATION AND FOR DISMISSAL**

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Come Defendants Tesla Motors TN, Inc. and Tesla, Inc. (incorrectly named in the Complaint as “Tesla Motors, Inc.”) (collectively, “Tesla”), pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.* (“FAA”) and Rule 12 of the Federal Rules of Civil Procedure, for entry of an Order compelling Plaintiffs’ lawsuit to arbitration and dismissing their Complaint. Under the FAA and Tennessee law, Plaintiffs are both bound by the terms of the Lease Agreement and Order Agreement with Tesla, which contain a clear and conspicuous arbitration provision. Accordingly, the Court should compel Plaintiffs to arbitration and dismiss their Complaint.

Tesla separately submits a memorandum in support of this Motion.

DATED this 15th day of May, 2020.

Respectfully submitted,

LEWIS, THOMASON, KING,  
KRIEG & WALDROP, P.C.

By: /s/ J. Randolph Bibb, Jr.  
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*Counsel for Defendants  
Tesla Motors TN, Inc.  
and Tesla, Inc.*

**CERTIFICATE OF CONSULTATION**

The undersigned hereby certifies, pursuant to Local Rule 7.2(a)(1)(B), that he conferred with Plaintiffs' counsel by electronic mail on May 14, 2020, and that the parties are unable to reach an accord with respect to the action requested in this Motion.

Dated the 15th day of May, 2020.

/s/ J. Randolph Bibb, Jr.  
J. Randolph Bibb, Jr.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 15, 2020, a true and exact copy of the foregoing Motion has been served upon counsel for the parties in interest herein by the Court's ECF system or by United States Mail with sufficient postage thereon to carry the same to its destination:

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